



**WATER SUPPLY CITIZENS  
ADVISORY COMMITTEE**  
to the Mass. Water Resources Authority

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Kathleen Baskin, P.E.  
Director of Water Policy  
Executive Office of Environmental Affairs  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02144

Dear Ms. Baskin,

Thank you for the opportunity to comment on the proposed Sustainable Water Management Initiative. We appreciate the significant effort the interagency workgroup, stakeholders and others have put into the development of the SWMI framework. The following is WSCAC's view on the SWMI and the potential role MWRA might play.

The committee has been following the SWMI process closely and several WSCAC members are stakeholders on the Technical Advisory Committee and the Water Management Act Advisory Committee. WSCAC concurs on the following points:

- WSCAC supports a scientifically determined Safe Yield that can restrict existing withdrawals from local sources to minimize environmental damage to stressed water bodies.
- WSCAC has always favored the responsible use of local sources. The challenge lies in balancing the use and protection of local sources with acceptable environmental impact.
- WSCAC supports the option for communities to purchase MWRA water when documentation proves that the community meets the MA Water Conservation Standards, BMP's have been utilized, yet negative environmental impacts on local resources remain.

As the largest wholesale water supplier in the state, the MWRA provides an important element to state water policy through its watershed system, infrastructure investment and conservation strategies.

Elements in the draft SWMI framework regarding groundwater recharge, streamflow criteria, impervious cover, ecological habitat preservation, and watershed protection have little impact on the MWRA because these issues have already been addressed by the Authority through its partnership with the Division of Water Supply Protection. While full or partially supplied MWRA communities have ample water available even in summer, water use in other communities, even within their WMA permits and registrations, may affect streamflow and require intervention.

Benefits of the extension of MWRA water to towns in stressed sub-basins could include:

- Increased river and stream flow when the ecosystems need it most due to decreased local well pumping.
- Improved water quality through dilution of effluent.
- Promoting a more regional approach to water and energy use.
- Protection of existing services provided by healthy ecosystems.

As currently written, the Safe Yields proposed by DEP in the SWMI process are higher than current withdrawals in all 30 major basins. Flows in 21% of the sub-basins are already severely impacted due to decreased flow during summer months. Although SWMI represents a start, some WSCAC members believe it doesn't go far enough. The state now has the scientific knowledge and technical capacity demonstrated by USGS and DFG to model and extrapolate the conditions of rivers and streams. If the SWMI framework incorporates more protective methods to address the documented environmental problems, communities can potentially decrease their use of local sources, increase demand management strategies and if necessary, supplement with another water source.

Water suppliers seem most concerned over changes to the permitting process relating to streamflow criteria, and the relationship between mitigation costs and environmental benefit. There is still a large degree of uncertainty on how DEP would implement the changes as well as the outcome of the pilot process in several communities over the next several months.

Due to good stewardship of the resource and rates structured to reflect the cost of maintaining a reliable water system, the MWRA is in a position to potentially serve communities needing supplementary water where low summer flows are most acute. While communities rarely opt for importing MWRA due to cost, setting more environmentally protective Safe Yields could encourage communities to conserve their local sources and possibly supplement with MWRA water.

In summary:

- While all agree that the state needs a more consistent set of regulations and foresight to manage water use sustainably, MassDEP's proposed Safe Yield methodology does not demonstrate the protection of local sources or exhibit enforceable regulations to mitigate existing degraded rivers and streams.
- MWRA has the potential to provide environmental benefit by providing supplemental water to communities meeting the requirements.

Thank you for the opportunity to comment.

Sincerely,

Whitney Beals, Chair

Lexi Dewey, Executive Director